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The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

BY ECF

**Re: *In re Terrorist Attacks on September 11, 2001*, No. 1:03-md-01570 (S.D.N.Y.)**

Dear Judge Netburn:

We write on behalf of defendant Dallah Avco in response to plaintiffs' May 21, 2021 letter motion proposing a September 15, 2021 due date for plaintiffs' expert reports against the Kingdom of Saudi Arabia and Dallah Avco, Dkt. 6816, and the Kingdom's May 26 response to that letter motion, filed under seal at Dkt. 6822.

Dallah Avco takes no position on the Kingdom's argument that there should be no expert submissions at all in this case. In doing so, Dallah Avco of course does not mean to cast any doubt on the factual premise of the Kingdom's argument – that plaintiffs have utterly failed to prove their claims in this case – or on the Kingdom's thorough canvassing of the relevant testimony in their sealed submission. Dkt. 6822 at 1-2 & n.1 & Exs. 1-2.

If the Court is inclined to permit expert submissions, Dallah Avco also takes no position on plaintiffs' request that the due date for plaintiffs' expert reports be set on some date after the June 30 close of fact discovery. Dallah Avco defers to the Court to set an appropriate deadline for plaintiffs' expert reports that will not unduly delay the further progress of the case.

Finally, Dallah Avco agrees with the Kingdom's proposal that the Kingdom and Dallah Avco submit to the Court a scheduling proposal for their own expert reports within 14 days of service of plaintiffs' reports. The Court has not previously set any deadline for Dallah Avco's expert reports. Dallah Avco will be better positioned to recommend a deadline for its own reports once it has reviewed plaintiffs' submissions.

We thank the Court for its time and attention to these matters.

Respectfully submitted,

Robert Kry

cc: All counsel by ECF